

UNITED STATES DISTRICT COURT

18 APR 26 PM 12:15

for the

CLERK-LAS CRUCES

District of New Mexico

United States of America)

v.)

Suzanne Reynolds)

Case No. 18-1415MJ)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 1, 2018 - March 6, 2018 in the county of Doña Ana in the
Judicial District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 846:

Conspiracy to distribute cocaine

18 U.S.C. § 1956(h):

International Money Laundering Conspiracy

This criminal complaint is based on these facts:

See attached statement of probable cause, attached and incorporated by reference herein.

☒ Continued on the attached sheet.

Complainant's signature

Allan Russo, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/26/2018



Judge's signature

City and state: Las Cruces, New Mexico

Kevin R. Sweazea, U.S. Magistrate Judge

Printed name and title

United States of America

v.

Suzanne Reynolds

Attachment to Criminal Complaint

I, Allan Russo, Affiant, being duly sworn, state that the following information is true and correct to the best of my knowledge and belief:

Between April 2017, and April 25, 2018, DEA and HSI agents were investigating a large-scale heroin and cocaine trafficking organization that was operating in southern New Mexico, west Texas and as far east as Tennessee and South Carolina. The investigation involved the court-authorized wiretap of 11 different telephones.

On February 20, 2018, pursuant to a wiretap Order signed by U.S. District Judge Robert C. Brack, agents began intercepting wire and electronic communications to and from a telephone ("Gonzales' Phone") used by Fidel Gonzales ("Gonzales"). Based on intercepted communications to and from Gonzales' Phone, as well as surveillance, agents believe that on March 2, 2018, and March 6, 2018, Suzanne Reynolds ("Reynolds") transported illegal drugs and drug proceeds on behalf of Gonzales.

On March 1, 2018, at approximately 9:28 a.m., agents intercepted a phone call, over Gonzales' Phone, between Gonzales and Barbara Michel ("Michel"). I believe that Michel, on behalf of a Mexican-based source of supply identified only as "Tio," operated a stash house in El Paso, TX, and that Gonzales was just one of many distributors receiving illegal drugs from Michel. I also believe that Michel, at the direction of "Tio," obtained drug proceeds from Gonzales and other local drug distributors, and that Michel sent the drug proceeds to "Tio" in Mexico. During the call, Gonzales told Michel that Gonzales was still "collecting" and that Gonzales would "send them" tomorrow. Based on my training, experience, and knowledge of the investigation, I believe that Gonzales was telling Michel that Gonzales was collecting drug proceeds to send to Michel on March 2, 2018. During this call, I believe that Gonzales also asked if the illegal drugs would be ready for pickup so that Gonzales and/or his courier could pick up the illegal drugs at the same time the drug proceeds were being delivered.

On March 2, 2018, at approximately 10:42 a.m., agents intercepted a call, over Gonzales' Phone, between Michel and Gonzales. During the call, I believe Gonzales asked if "Tio" had delivered narcotics for Gonzales, and Michel affirmed. Gonzales then stated that he was on his way to Michel's residence.

At approximately 12:25 p.m., on March 2, 2018, agents observed a blue Ford Mustang, registered to Suzanne Reynolds, arrive at Michel's residence located at 1578 Rebecca Ann Drive in El Paso, TX. Agents observed Reynolds as the driver of the Mustang and Fidel Ortiz ("Ortiz") as the front passenger. A few minutes after the Mustang arrived, agents observed Ortiz exit the passenger seat of the vehicle and enter Michel's residence through the garage door.

At approximately 12:31 p.m., on March 2, 2018, agents intercepted an incoming call from Ortiz to Gonzales over Gonzales' Phone. During the call, agents believe Ortiz told Gonzales that the

total amount of money delivered was only approximately \$14,000. Gonzales negated, and Ortiz stated, "Yes, because all the other bundles that [STUTTERS] is ten, and then the... the hundred dollar bills there's only four, four thousand." Ortiz then asked Gonzales if Gonzales had spoken to "Tio." After Gonzales negated, Ortiz handed the phone over to Michel. Michel told Gonzales she had already told "Tio" that Gonzales had "sent fifteen (15)," which I believe to be \$15,000 in drug proceeds. Michel further told Gonzales that because he was short "eleven, sixty (1160)," Gonzales needed to bring her \$1,160 the next day. Michel also told Gonzales to tell "him," believed to be "Tio," that Gonzales was short \$1,160. Gonzales agreed. In the background, Ortiz asked Michel if Ortiz is taking anything, and Michel stated that she was "getting it for" Ortiz. Michel also told Gonzales, "Yeah, I'll give him whatever Tio left you here." I believe Michel was telling Gonzales that she would give Ortiz the narcotics that Gonzales and "Tio" had previously discussed.

At approximately 12:42 p.m., on March 2, 2018, agents observed Ortiz exit the garage with his hands in his jacket as he walked to the Ford Mustang. Agents then followed the Mustang from Michel's residence to Las Cruces, NM. The Mustang parked at the Walgreens parking lot located across the street from Gonzales' business, located at 2855 W. Picacho Ave., in Las Cruces, NM. At approximately 2:14 p.m., agents observed Ortiz exit the Mustang and walk to Gonzales' business. During this time, agents could see Ortiz, with his jacket draped over his right shoulder, carrying a plastic bag on his right hand.

Based on intercepted communications and surveillance, I believe that on March 2, 2018, Ortiz and Reynolds delivered approximately \$13,840 in drug proceeds to Michel in El Paso, TX. I also believe that Ortiz and Reynolds obtained cocaine from Michel, and then delivered the cocaine to Gonzales at his shop.

On March 5, 2018, at approximately 2:26 p.m., agents intercepted a call, over Gonzales' Phone, between Gonzales and "Tio." During the call, Gonzales asked if "Tio" could send Gonzales "one" on the following day. Gonzales also told "Tio" that Gonzales had "twenty-five" for "Tio." In response, "Tio" agreed to send "one" to Gonzales. Gonzales then asked "Tio" what time "Tia" would be going to work on March 6, 2018. Based on my knowledge of this investigation, I believe that Gonzales was asking "Tio" for one kilogram of cocaine, and "Tio" agreed to give Gonzales one kilogram of cocaine on March 6, 2018. I also believe that Gonzales told "Tio" that Gonzales would be sending \$25,000 in drug proceeds to Michel, whom Gonzales and others refer to as "Tia," on March 6, 2018.

At approximately 8:10 p.m., on March 5, 2018, agents intercepted a call, over Gonzales' Phone, between Gonzales and Michel, in which Gonzales told Michel that Ortiz would be going to Michel's residence at 10:00 a.m. on March 6, 2018. Michel told Gonzales that Michel had "something" for Gonzales. I believe that during this call, Gonzales was telling Michel that Gonzales would be sending Ortiz to Michel's to deliver the \$25,000 in drug proceeds and to pick up the kilogram of cocaine. When Michel told Gonzales that she had "something" for Gonzales, I believe she was telling Gonzales that she had the kilogram of cocaine that "Tio" had sent to Gonzales.

Approximately five minutes later, at 8:15 p.m. on March 5, 2018, agents intercepted a text message from Gonzales to Brian Estrada ("Estrada"). I know that Estrada is a drug and drug proceeds courier for Gonzales. The text message stated, "Tell u wife 2 take u 2 w0rk at 830 g0ta b Out der b4 10am k." In response, Estrada sent the following text message to Gonzales: "K Jus told her. U Got tha mail truk bak." Gonzales replied, "N0t yet dnt take ur truck 2 w0rk Only blue b On time f00." Based on my training, experience, and knowledge of this investigation, I believe that Gonzales was telling Estrada to have Reynolds, believed to be Estrada's common-law wife, bring Estrada to Gonzales' business by 8:30 a.m. on March 6, 2018. I also believe that Gonzales asked Estrada to bring Reynolds so that Reynolds could drive Ortiz to El Paso to drop off drug proceeds at, and then pick up illegal drugs from, Michel's residence. I believe that Estrada told Gonzales that Estrada had confirmed with Reynolds that she would be available to make the delivery. I also believe Estrada was asking Gonzales which vehicle Reynolds should use to transport the drugs and drug proceeds, and Gonzales responded the blue Ford Mustang.

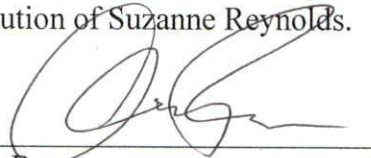
On March 6, 2018, at approximately 8:13 a.m., agents observed Estrada enter the driver's seat and Reynolds enter the passenger seat of Reynold's blue Ford Mustang. After Estrada and Reynolds entered the Mustang, it departed 4258 Calle de Estrellas, Las Cruces, NM. At approximately 8:36 a.m., the Mustang arrived at Gonzales' business (Roadrunner Transport & Diesel) located at 2855 W. Picacho Ave, Las Cruces. At approximately 8:40 a.m., agents observed Reynolds enter the driver's seat of the Mustang and Ortiz enter the passenger seat of the Mustang before it departed the area.

At approximately 9:59 a.m., on March 6, 2018, agents intercepted a call between Gonzales and Michel, in which Gonzales told Michel that Ortiz was outside Michel's residence. Approximately one minute later, at 10:00 a.m., agents observed Reynold's blue Mustang arrive at Michel's residence located at 1578 Rebecca Ann in El Paso, TX. At approximately 10:04 a.m., agents observed Ortiz exit the passenger seat of the Mustang and enter Michel's residence. At approximately 10:12 am, agents observed Ortiz exit the residence and enter the blue Mustang. Shortly thereafter, the blue Mustang departed the area.

Based on intercepted communications and surveillance, I believe that on March 6, 2018, Ortiz and Reynolds delivered approximately \$25,000 in drug proceeds to Michel in El Paso, TX. I also believe that Ortiz and Reynolds obtained cocaine from Michel.

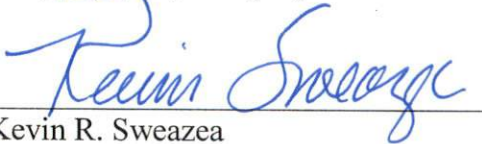
On April 25, 2018, I approached Reynolds, advised her of her *Miranda* rights and she agreed to speak with me. Reynolds admitted that she and Ortiz had transported drug proceeds from Las Cruces, NM, to El Paso, TX on behalf of Gonzales and Estrada three times during the past few months. Reynolds admitted that she knew what she was transporting was drug proceeds and that those proceeds were to be delivered to someone in Mexico. Reynolds stated that after she and Ortiz delivered the drug proceeds, they also picked up cocaine from Michel in El Paso, TX, and they eventually delivered the cocaine to Gonzales. Reynolds stated that she did not know how much cocaine she and Ortiz transported but that they used her blue Mustang to transport it. Reynolds stated that she was paid \$300 each time she and Ortiz transported the cocaine and drug proceeds for Gonzales.

Assistant United States Attorneys Selesia L. Winston and Sarah M. Davenport were advised of the facts of this investigation, and accepted prosecution of Suzanne Reynolds.



Allan Russo
Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me on
this 26 day of April, 2018.



Kevin R. Sweazea
United States Magistrate Judge